

1 DAVID L. ANDERSON (CABN 149604)  
United States Attorney

2 HALLIE HOFFMAN (CABN 210020)  
3 Chief, Criminal Division

4 CASEY BOOME (NYBN 5101845)  
RYAN REZAEI (CABN 285133)  
5 Assistant United States Attorney

6 450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
7 Telephone: (415) 436-7200  
FAX: (415) 436-7234  
8 casey.boome@usdoj.gov  
ryan.rezaei@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT  
11 NORTHERN DISTRICT OF CALIFORNIA  
12 SAN FRANCISCO DIVISION

13  
14 UNITED STATES OF AMERICA, ) NO. CR 19-226 RS  
15 Plaintiff, )  
16 v. ) STIPULATION AND [PROPOSED]  
17 LORENZO LEE, ) ORDER EXCLUDING SPEEDY TRIAL  
a/k/a "O.G." ) TIME FROM JUNE 17, 2019 UNTIL  
18 JEFFREY MCCOY, ) SEPTEMBER 17, 2019  
19 ANTHONY BROWN, )  
a/k/a "Ant Man," )  
20 DESHAWNTE GAMBOA, )  
DEBORAH POLK, )  
EVAN MARTINEZ-DIAZ, )  
21 MAGO AGUILAR-PACHECO, )  
CESAR ALVARADO, )  
22 JESSE LOPEZ, III, )  
JOSE DELGADILLO, )  
a/k/a "Tepa," )  
23 MARCO DELGADILLO, )  
a/k/a "Tonio," )  
24 LUIS TORRES-GARCIA, )  
a/k/a "Guero," and )  
25 TIMOTHY PEOPLES, )  
a/k/a "Tee," )  
26 Defendants. )  
27 )  
28 )

1       Subject to this Court's confirming order, the defendants, by and through undersigned counsel,  
2 and the United States, by and through Assistant United States Attorney Casey Boome, hereby stipulate  
3 and agree as follows:

4           At a status conference before this Court on June 18, 2019, government counsel and counsel for  
5 the defendants agreed that time should be excluded under the Speedy Trial Act to allow for effective  
6 preparation of defense counsel, including reviewing voluminous discovery to be provided by the  
7 government in the immediate future, as soon as the parties have identified a discovery coordinator. At  
8 the request of the parties and in consultation with the courtroom deputy, the Court continued the matter  
9 to September 17, 2019 at 2:00 p.m. The parties, therefore, now jointly request that the time from June  
10 18, 2019 to September 17, 2019 be excluded from computation under the Speedy Trial Act. The parties  
11 agree that, for the reasons set forth above, the ends of justice served by excluding the time from June 18,  
12 2019 to September 17, 2019 outweigh the best interests of the public and the defendants in a speedy  
13 trial. *See* 18 U.S.C. § 3161(h)(7)(A). The parties further agree that an excludable continuance is  
14 necessary for the effective preparation of counsel, taking into account the exercise of due diligence. *See*  
15 18 U.S.C. § 3161(h)(7)(B)(iv).

16           As such, the parties respectfully request that the Court order that the time from June 18, 2019 to  
17 September 17, 2019 be excluded from computation under the Speedy Trial Act.

18 DATED: June 20, 2019

Respectfully submitted,

19           DAVID L. ANDERSON  
20           United States Attorney

21           \_\_\_\_\_  
22           /s/ *Casey Boome*  
23           CASEY BOOME  
24           Assistant United States Attorney

25           \_\_\_\_\_  
26           /s/ *with permission*  
27           ETHAN ATTICUS BALOGH  
28           Attorney for Marco Delgadillo

25           \_\_\_\_\_  
26           /s/ *with permission*  
27           RICHARD B. MAZER  
28           Attorney for Lorenzo Lee

/s/ with permission  
CANDIS MITCHELL  
Attorney for Anthony Brown

*/s/ with permission*  
SCOTT A. SUGARMAN  
Attorney for Timothy Peoples

/s/ with permission  
JAMES SCOTT THOMPSON  
Attorney for Deshawnte Gamboa

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*/s/ with permission*

JESSICA WALSH  
Attorney for Jose Delgadillo

/s/ with permission  
RANDY SUE POLLOCK  
Attorney for Deborah Polk

1                   **[PROPOSED] ORDER**

2         Based upon the facts set forth in the stipulation of the parties, the Court finds that failing to  
3 exclude the time from June 18, 2019 to September 17, 2019 would unreasonably deny defense counsel  
4 and the defendants the reasonable time necessary for effective preparation, taking into account the  
5 exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of  
6 justice served by excluding the time from June 18, 2019 to September 17, 2019 from computation under  
7 the Speedy Trial Act outweigh the best interests of the public and the defendants in a speedy trial.  
8 Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from June 18,  
9 2019 to September 17, 2019 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C.  
10 §§ 3161(h)(7)(A), (B)(iv).

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14         Dated: \_\_\_\_\_

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HON. RICHARD SEEBORG  
United States District Court Judge